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Attorneys for Defendant  
 FIRST BANK OF DELAWARE

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

AMBER KRISTI MARSH and STACIE EVANS,  
 individually and on behalf of a class of similarly situated  
 persons,

Plaintiffs,

v.

**ZAAZOOM SOLUTIONS, LLC**, a Delaware Limited Liability Company, **ZAZA PAY LLC**, a Delaware Limited Liability Company dba Discount Web Member Sites, LLC, Unlimited Local Savings, LLC, Web Discount Club, Web Credit Rpt. Co., MegaOnlineClub, LLC, and RaiseMoneyForAnything; **MULTIECOM, LLC**, a Colorado Limited Liability Company dba Online Discount Membership, Web Discount Company, and Liberty Discount Club; **ONLINE RESOURCE CENTER, LLC**, a Delaware Limited Liability Company dba Web Coupon Site, USave Coupon, and UClip; **MOE TASSOUDJI**, an individual, **BILL CUEVAS**, an individual, **FIRST BANK OF DELAWARE**, a Delaware Corporation, **FIRST NATIONAL BANK OF CENTRAL TEXAS**, a Texas Corporation; **SUNFIRST BANK**, a Utah Corporation; **JACK HENRY & ASSOCIATES, INC.**, a Delaware Corporation dba ProfitStars; **AUTOMATED ELECTRONIC CHECKING, INC.**, a Nevada Corporation; **DATA PROCESSING SYSTEMS, LLC**, a Delaware Limited Liability Company and DOES 1-10, inclusive,

Defendants.

CASE NO. 3:11-cv-05226-RS

**STIPULATION AND  
 [PROPOSED] ORDER TO SET  
 TIME OF FIRST BANK OF  
 DELAWARE TO RESPOND  
 TO SECOND AMENDED  
 COMPLAINT**

**STIPULATION AND [PROPOSED] ORDER**

**TO THIS HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

It is hereby stipulated, by and between plaintiffs Amber Kristi Marsh and Stacie Evans (“Plaintiffs”) and defendant First Bank of Delaware, by and through their respective attorneys of record, that, subject to the approval of this Court, the time of First Bank of Delaware to respond to the Second Amended Complaint is extended to and includes December 9, 2011. This Stipulation is based upon the facts:

1. This case previously was pending in the Superior Court of California, County of San Francisco. During that time, defendant First Bank of Delaware was served with the Second Amended Complaint on September 26, 2011.

2. This case was removed to this Court on October 26, 2011 by another defendant.

3. Due to inadvertent clerical oversight and the inadvertent failure of internal procedures for docketing the service of a summons and complaint, First Bank of Delaware did not docket this case when it was served. The service of the summons and complaint and the existence of the Second Amended Complaint was not known to senior management of First Bank of Delaware until November 9, 2011.

5. Subject to the approval of this Court, Plaintiffs and First Bank of Delaware agree that First Bank of Delaware may have an extension of time, to and including December 9, 2011, within which to respond to Plaintiffs’ Second Amended Complaint.

6. Defendant First Bank of Delaware reserves its right to assert any and all defenses to Plaintiffs’ Second Amended Complaint in its response thereto, including but not limited to objections to jurisdiction, and the filing of this Stipulation is without prejudice to the right to assert any and all such defenses.

1 Dated: November 18, 2011

DLA PIPER LLP (US)

2 By: /s/ Paul J. Hall

3 PAUL J. HALL  
4 Attorneys for Defendant  
FIRST BANK OF DELAWARE

5 Dated: November 18, 2011

KROENENBERGER ROSENFELD LLP

6 By: /s/ Jeffrey M. Rosenfeld

7 JEFFREY M. ROSENFELD  
8 KARL S. KRONENBERGER  
9 Attorneys for Plaintiffs  
AMBER KRISTI MARSH and STACIE  
EVANS

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12 I, Paul J. Hall, am the ECF user whose ID and password are being used to file this  
13 STIPULATION AND [PROPOSED] ORDER TO SET TIME OF FIRST BANK OF  
14 DELAWARE TO RESPOND TO SECOND AMENDED COMPLAINT. In compliance with  
15 General Order 45, X.B., I hereby attest that Jeffrey M. Rosenfeld has concurred in this filing.  
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**PROPOSED ORDER**

Based on the foregoing stipulation of the Plaintiffs and Defendant First Bank of Delaware, and good cause appearing therefor,

**IT IS HEREBY ORDERED** that Defendant First Bank of Delaware shall have an extension of time, to and including December 9, 2011, within which to respond to the Second Amended Complaint.

Dated: November 30, 2011.



Honorable Richard Seeborg  
United States District Judge